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Attorney for Defendant
Gerald Dickerson

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

V.

GERALD DICKERSON, AND
AMY WILLIAMS,

Defendant.

No. 1:21-CR-00224-NODJ-BAM

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER
SPEEDY TRIAL ACT; FINDINGS AND
ORDER**

Date: November 13, 2024

Time: 1:00 PM

Court: Hon. Barbara A. McAuliffe

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on November 13, 2024.
 2. By this stipulation, defendants now move to continue the status conference until February 26, 2024, and to exclude time between November 13, 2024, and February 26, 2024, 18 U.S.C. § 3161(h)(7)(A), (B)(iv) [Local Code T4].
 3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes reports, photographs, and audio files all of the discovery has been either

1 produced directly to counsel and/or made available for inspection and copying.

2 b) The government has provided plea agreements to defendants.

3 c) Counsel for defendants desire additional time to further review discovery,
4 discuss potential resolution with their clients and the government, and investigate and
5 prepare for trial.

6 d) Counsel for defendants believe that failure to grant the above-requested
7 continuance would deny him/her the reasonable time necessary for effective preparation,
8 taking into account the exercise of due diligence.

9 e) The parties will be prepared to set the matter for jury trial if there have
10 been no resolutions to this matter by the next status date.

11 f) The government does not object to the continuance.

12 g) Based on the above-stated findings, the ends of justice served by
13 continuing the case as requested outweigh the interest of the public and the defendant in a
14 trial within the original date prescribed by the Speedy Trial Act.

15 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §
16 3161, et seq., within which trial must commence, the time period of November 13, 2023
17 to February 26, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. §
18 3161(h)(7)(A), (B)(iv) [Local Code T4] because it results from a continuance granted by
19 the Court at defendants' request on the basis of the Court's findings that the ends of
20 justice served by taking such action outweigh the best interest of the public and the
21 defendants in a speedy trial.

22 i) The parties also agree that this continuance is necessary for several
23 reasons, including but not limited to, the need to permit time for the parties to exchange
24 supplemental discovery, engage in plea negotiations, and for the defense to continue its
25 investigation and preparation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i)
26 and (iv).

27 4. Nothing in this stipulation shall preclude a finding that other provisions of the
28 Speedy Trial Act dictate that additional time periods are excludable from a period within which a

1 trial must commence.

2 IT IS SO STIPULATED.

3 Dated: November 6, 2024

PHILLIP A. TALBERT
United States Attorney

4
5 /s/ STEPHANIE M. STOKMAN
6 STEPHANIE M. STOKMAN
7 Assistant United States Attorney

8 Dated: November 6, 2024

9 /s/ SERGUEL M. AKITI
10 SERGUEL M. AKITI
11 Counsel for Defendant
12 GERALD DICKERSON

13 Dated: November 6, 2024

14 /s/ REED GRANTHAM
15 REED GRANTHAM
16 Counsel for Defendant
17 AMY WILLIAMS

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19
20 **ORDER**

21 IT IS SO ORDERED that the status conference is continued from November 13, 2024, to
22
23 **February 26, 2025, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A.**
24
25 **McAuliffe.** Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv). **However, in any**
26
27 **request for a continuance, the parties shall explain when they will be ready to set a trial date.**

28 IT IS SO ORDERED.

Dated: November 8, 2024

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE